## **DECLARATION OF JAYNE ANDERSON RISK, ESQ.**

I, Jayne Anderson Risk, Esq., declare:

- 1. I am over the age of eighteen (18). Unless otherwise indicated, I have personal knowledge of the matters set forth in this declaration, and I am competent to testify to the following:
- 2. I am an attorney licensed and in good standing in the Commonwealth of Pennsylvania and the State of New York. I am a partner in the law firm of DLA Piper LLP (US) ("DLA Piper").
- 3. I understand that this Declaration is offered in support of Goodyear's motion to transfer the action captioned as *Susman*, et al. v. Goodyear Tire & Rubber Company, et al. from the United States District Court for the Eastern District of Pennsylvania to the United States District Court for the District of Nebraska.
- 4. I, with my law firm, DLA Piper, was retained by Goodyear to represent its interests in this action.
- 5. In the course of that representation, I received and reviewed a copy of a police report, detailing the accident underlying this action. A true and correct copy of that police report is attached to the Declaration of Edward S. Bott, Esq. as Exhibit A.
  - 6. The police report identifies two eyewitnesses: Rob Gibson and Mary K. Gibson.
- 7. Upon information and belief, both Mr. Gibson and Ms. Gibson reside and/or work in the State of Nebraska. A true and correct copy of a monitor report on Rob Gibson is attached here as **Exhibit A**. A true and correct copy of a monitor report on Mary K. Gibson is attached here as **Exhibit B**.

I declare under penalty of perjury that the foregoing is true and correct. This declaration was executed on July 26, 2017, in Philadelphia, Pennsylvania.

Jayne Anderson Risk, Esq